

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

**TALI WASHBURN,**

Plaintiff,

v.

**C6-ZERO, LLC,**

**C6-ZERO IOWA, LLC**

**C6-ZERO HOLDINGS, LLC,**

**SECOND-61, LLC**

**ABACUS SOLUTIONS GROUP, LLC,**

**BRAND TECHNOLOGIES  
CORPORATION,**

**DORE LAW GROUP, LLC**

**BRANDLICH ASSETS, LLC,**

**BRANDLICH CONSTRUCTION,  
LLC,**

**BRANDLISH ENERGY SOLUTIONS,  
LLC,**

**BRANDLISH ENERGY SOLUTIONS  
HOUSTON, LLC,**

**BRANDLICH ENERGY SOLUTIONS  
SAN ANTONIO, LLC,**

**BRANDLICH ENERGY SOLUTIONS  
CASPER, LLC,**

**BRANDLICH ENERGY SOLUTIONS  
OREGON, LLC,**

**BRANDLICH ENERBY SOLUTIONS  
SAN JOAQUIN,**

**BRAND TECHNOLOGIES, LLC,**

**HOWARD BRAND,**

**TIME DORE,**

**CHRITOPHER KOEHN,**

Case No. 24-CV-67-LTS-KEM

**DEFENDANTS SECOND-61, LLC  
AND CHRISTOPHER KOEHN'S  
MOTION TO DISMISS PLAINTIFF'S  
FIRST AMENDED COMPLAINT**

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<b>BUFFY KOEN, SHANE PULVER, JOE LAVIGNE, JOHN DOE ENTITY DEFENDANTS, and JOHN DOE DEFENDANTS.</b>  Defendants	
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Defendants Second-61, LLC and Christopher Koehn, through their undersigned counsel, hereby move to dismiss all cause of action under Fed. R. Civ. P. 12(b)(5), on the following grounds:

1. Plaintiff's original Complaint was filed on July 12, 2024.
2. Service upon the Defendants under Fed. R. Civ. P. 4(m) was required to be completed no later than October 10, 2024.
3. Service on Second-61, LLC was not completed until October 23, 2024.
4. Service on Christopher Koehn was not completed until October 25, 2024.
5. Defendants Second-61, LLC and Christopher Koehn's addresses were known to the Plaintiff. She had every opportunity to properly serve Second-61, LLC and Christopher Koehn before the expiration of 90 days as required under Fed. R. Civ. P. 4(m).
6. This *Motion* is based on this filing and the concurrently filed *Brief in Support Motion to Dismiss*.

FOR THESE REASONS, Defendants Second-61, LLC and Christopher Koehn request this Court dismiss all claims against the Defendants Second-61, LLC and Christopher Koehn contained in the *First Amended Complaint*.

Respectfully submitted this 12<sup>th</sup> day of November 2024,

PARRISH KRUIDENIER

s/ *Alfred Parrish*

Alfredo Parrish  
2910 Grand Avenue  
Des Moines, IA 50312-4205

Tel.: (515) 284-5737

*PRO HAC VICE ADMISSION PENDING*  
GESSLER BLUE LLC

s/ *Scott E. Gessler*

Scott E. Gessler  
Gessler Blue, LLC  
7350 E. Progress Place, Suite 100  
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**CERTIFICATE OF SERVICE**

I certify that on this 12<sup>th</sup> day of November 2024, the foregoing was electronically served via CM/ECF on all parties via their counsel of record as follows:

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*Attorney for Plaintiff*

s/ *Lori Yardley*